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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\* \* \*

CARLOS EFRAIN LEONEL  
GARCIA, an individual, on behalf of  
himself and all those similarly  
situated,

Plaintiff,

vs.

AUTOVEST, LLC, a foreign limited  
liability company;

Defendant.

CASE NO.: 2:16-cv-00601-JAD-CWH

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE JOINT  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS  
SETTLEMENT**

**(SECOND REQUEST)**

1 Plaintiff Carlos Efrain Leonel Garcia (“Plaintiff”), nonparty Lorraine Belt  
2 (“Belt”), and defendant Autovest, L.L.C. (“Autovest”) (collectively, the “Stipulating  
3 Parties”), by and through their undersigned counsel, hereby stipulate as follows:

4 1. On November 8, 2016, the parties filed a Stipulation and Order Staying  
5 Pending Motions and Setting Date to Submit Joint Motion Re Approval of Class  
6 Settlement. The stipulation stated that the parties have reached a class-wide  
7 settlement in principle and that a joint motion for approval of the settlement will be  
8 filed on or before December 16, 2016.

9 2. On November 14, 2016, the Court entered an Order denying all pending  
10 motions without prejudice and, consistent with the parties’ stipulation, requiring the  
11 joint motion for preliminary approval of the settlement to be filed on or before  
12 December 16, 2016.

13 3. Pursuant to the Stipulating Parties’ request, on December 15, 2016, the  
14 Court extended the deadline file the joint motion for approval of the settlement to  
15 January 13, 2017, in order to give Defendant additional time to review its records, to  
16 identify necessary class information and to review the settlement documents with its  
17 counsel, who was out of the office from December 23, 2016 through January 2, 2017.

18 4. On January 4, 2017, Defendant proposed several substantive revisions  
19 to the terms of the settlement agreement and class notice.

20 5. On January 10, 2017, Plaintiff and Belt agreed to most of the revisions,  
21 however, substantive disagreement remained on at least two remaining issues.

22 6. On January 12, 2017, the Stipulating Parties met and conferred by phone  
23 in attempt to solve those issues.

24 7. In light of the ongoing negotiations, the Stipulating Parties have agreed  
25 to further extend the deadline to file the joint motion for preliminary approval of the  
26 settlement from January 13, 2017 to January 31, 2017.

27 8. The extension is warranted because the Stipulating Parties have been  
28 engaged in good faith negotiations in an effort to finalize the settlement and have

1 made substantial progress. The Stipulating Parties believe additional time to  
2 consider each side's respective positions as to the final remaining issues will be  
3 beneficial and increase the likelihood of reaching a final agreement.

4 9. This is the second stipulation for an extension of time relating to the  
5 joint motion for preliminary approval of the settlement.

6 For the reasons stated herein and pursuant to Local Rules IA 6-1, IA 6-2 and  
7 7-1, the Stipulating Parties hereby agree that the parties' deadline to file the joint  
8 motion for preliminary approval of the class settlement is extended from January 13,  
9 2017. to January 31, 2017.

10  
11 DATED: January 12, 2017

SIMMONDS & NARITA LLP

12  
13 /s/R. Travis Campbell  
14 R. TRAVIS CAMPBELL (pro hac vice)  
15 California Bar #271580  
16 Attorneys for Defendant  
17 44 Montgomery Street, Suite 3010  
18 San Francisco, CA 94104

16 DATED: January 12, 2017

LEGAL AID CENTER OF  
SOUTHERN NEVADA, INC.

18  
19 /s/Dan L. Wulz  
20 DAN L. WULZ  
21 Nevada Bar #5557  
22 Attorneys for Plaintiff and nonparty  
23 Lorraine Belt  
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25 Las Vegas, NV 89104

26 IT IS SO ORDERED

27  
28   
The Honorable Jennifer Dorsey  
United States District Judge

DATED: January 13, 2017